

REDACTED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

3

UNITED STATES OF AMERICA

v.

JAVON WARREN,

Defendant.

~~SEALED~~

UNSEALED
11/7/24
KJK

Criminal Action No. 24-6

FILED

JAN 11 2024

US DISTRICT COURT
DISTRICT OF DELAWARE

INDICTMENT

The Grand Jury for the District of Delaware charges that:

Introduction and Background

At all times material to this Indictment:

1. Defendant JAVON WARREN was a resident of Delaware.
2. Delmarva Speed and Sport, located in Milford, Delaware; and the State Trading LLC Pawn Shop, located in Milford, DE, both possessed a federal firearms license ("FFL") and were authorized to deal in firearms under federal laws.
3. FFL holders are licensed, among other things, to sell firearms and ammunition. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms and ammunition.
4. The rules and regulations governing FFL holders require that a person seeking to purchase a firearm fill out a Firearm Transaction Record, ATF Form

4473 ("Form 4473"). Part of the Form 4473 requires that the prospective purchaser certify that all his or her answers on the Form 4473 are true and correct.

5. Question 21.a. of the Form 4473 requires that the prospective purchaser certify truthfully that he or she is the actual transferee/buyer of all of the firearm(s) listed on this form. In the certification section of the Form 4473, the actual buyer must certify that his or her answers to the questions on the form are "true, correct, and complete." The actual buyer must also acknowledge by his or her signature that "I understand that answering 'yes' to question 21.a. if I am not the actual transferee/buyer is a crime punishable as a felony under Federal law and may also violate State and/or local law."

6. FFL holders are required by law to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including the buyer's home address and date of birth.

COUNT ONE

7. Paragraphs 1 through 5 of this Indictment are re-alleged herein.

8. On or about February 26, 2022, in the District of Delaware, the defendant, JAVON WARREN, in connection with the acquisition of a firearm, that is, SAR Arms, model SarB6P, 9mm pistol bearing serial number T1102-16E14704 from the Milford, Delaware State Trading Pawn Shop, licensed under the provisions of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, intended and likely to deceive that dealer with respect to a fact material to the lawfulness of the sale of the firearm under the provisions of Chapter

44, Title 18, United States Code, in that defendant, JAVON WARREN, provided a written statement on Form 4473 certifying that he was the actual transferee/buyer of the firearm listed on this form, when in fact, as he know, that statement was false and fictitious.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

NOTICE OF FORFEITURE


Upon conviction for the offense alleged in Count One of this Indictment, the defendant, JAVON WARREN, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28 United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense, including but not limited to: (1) Strassels Mach Inc., model C9, 9mm pistol bearing serial number P10119080; (2) FMK, model 9C1 G2, 9mm pistol bearing serial number BGG6333; (3) FMK, model 9C1 G2, 9mm pistol bearing serial number BGG6299; (4) Glock, model 17, 9mm pistol bearing serial number BTME788; (5) SAR Arms, model SarB6P, 9mm pistol bearing serial number T1102-16E14704; (6) Hi Point, model C9, 9mm pistol bearing serial number P10159191; (7) Pioneer Arms, model Hellpup, 7.62 caliber pistol bearing serial number PAC1166144; (8) Taurus, model G2C, 9mm pistol bearing serial number 1C072414; (9) Glock, model 43x, 9mm pistol bearing serial number BUTE656; (10) Glock, model 17, 9mm pistol bearing serial number BTML846; (11) Ruger, model Security-9, 9mm pistol bearing serial number 384-

89690; and (12) Smith & Wesson, model SD9VE 9mm pistol bearing serial number FDD9125.

A TRUE BILL:


FOREPERSON

DAVID C. WEISS
UNITED STATES ATTORNEY

By: 
Eli H. Klein
Assistant United States Attorney

Dated: January 11, 2024